

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

**IN RE: SHIRLEY DOUGLAS**

**CHAPTER 13 PROCEEDING**

**CASE NO. 09-13893**

**TERRE M. VARDAMAN, TRUSTEE FOR  
THE ESTATE OF SHIRLEY ANN DOUGLAS**

**PLAINTIFF**

**VS.**

**ADVERSARY NO. 10-01187-DWH**

**RICHARD B. SCHWARTZ, SCHWARTZ &  
ASSOCIATES, P.A., and VANN F. LEONARD  
AND JOHN DOES**

**DEFENDANTS**

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**DEBTOR SHIRLEY DOUGLAS' RESPONSE TO MOTION TO STAY**

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Debtor, Shirley Douglas, responds to Defendants' Motion to Stay as follows:

1. Debtor agrees that her action filed in Hinds County Mississippi was the first filed and that, therefore, this action should be stayed.
2. Debtor notes that the staying of this action should not prevent this Court from granting Debtor's pending Motion to Require Schwartz to pay \$172,414.68 to the Trustee or into the Registry of the Court. Debtor filed that motion in her bankruptcy proceeding and the motion involves issues properly before this Court.

This the 22<sup>nd</sup> day of December, 2010.

Respectfully Submitted,

SHIRLEY DOUGLAS

By Her Attorney,

/s/ Philip W. Thomas  
PHILIP W. THOMAS

PHILIP W. THOMAS, P.A.  
747 North Congress Street  
Jackson, MS 39202  
Post Office Box 24464  
Jackson, MS 39225-4464  
Tel: (601) 714-5660  
Fax: (601) 714-5659

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**CERTIFICATE OF SERVICE**

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I certify that I electronically filed the foregoing document with the Clerk of the Court using the ECF system which sent notification of such filing to counsel who have electronically registered the non-ECF participants.

Terre M. Vardaman, Esquire  
Chapter 13 Case Trustee  
Post Office Box 1326  
Brandon, Mississippi 39043  
[missatty@bellsouth.net](mailto:missatty@bellsouth.net)

Paula E. Drungole, Esquire  
Debtor's Bankruptcy Counsel  
Post Office Box 186  
Starkville, Mississippi 39760  
[drungolelawfirm@bellsouth.net](mailto:drungolelawfirm@bellsouth.net)

Office of the United States Trustee  
100 West Capitol Street, Suite 706  
Jackson, Mississippi 39269  
[USTRRegions05.AB.ECF@usdoj.gov](mailto:USTRRegions05.AB.ECF@usdoj.gov)

Selene D. Maddox  
Maddox Law Office  
362 N. Broadway Street  
Tupelo, Mississippi 38804-3926  
[sdmaddox63@gmail.com](mailto:sdmaddox63@gmail.com)

R. Adam Kirk  
Gore, Kilpatrick & Dambrino, PLLC  
135 First Street (38901)  
Post Office Box 901  
Grenada, Mississippi 38902-0901  
[akirk@gorekilpatrick.com](mailto:akirk@gorekilpatrick.com)

Richard C. Bradley, III  
J. Wyatt Hazard  
Daniel, Coker, Horton & Bell, P. A.  
Post Office Box 1084  
Jackson, Mississippi 39215-1084  
[rbradley@danielcoker.com](mailto:rbradley@danielcoker.com)  
[whazard@danielcoker.com](mailto:whazard@danielcoker.com)

Joseph Anthony Sclafani  
BRUNINI, GRANTHAM, GROWER & HEWES, PLLC  
Post Office box 119  
Jackson, Mississippi 39205-0119  
[jsclafani@brunini.com](mailto:jsclafani@brunini.com)

This the 22<sup>nd</sup> of December, 2010.

/s/ Philip W. Thomas  
PHILIP W. THOMAS